

Amendment  
Serial No. 09/954,657

Docket No. DE000148

### REMARKS

Entry of this amendment and reconsideration are respectfully requested in view of the amendments made to the claims and for the remarks made herein.

Claims 1-8 and 10-12 are pending and stand rejected. Claims 1, 7 and 8 have been amended.

Claims 1, 3, 5-7, 8 and 11 stand rejected under 35 USC 103(a) as being unpatentable over Junqua (USP no. 6,415,257) in view of Partovi (USP no. 6,807,574) and further in view of Allinger (DE 19747745).

Applicant respectfully disagrees with and explicitly traverses the reason for rejecting the claims. However, in the interest of advancing the prosecution of this matter, the independent claims have been amended to more clearly state the invention. More specifically, the independent claims have been amended to state "the system outputs are adapted in content and/or form in dependence on the derived models including an experience level, wherein if the experience level is low, the system output is a first length, while if the experience level is high, the system output is a second length lesser than the first length." No new matter has been added. Rather the order of the subject matter recited in the claims have been re-arranged to more clearly present the subject matter claimed as the invention.

Junqua recites a system for identifying and adapting a TV-user profile by means of speech technology that controls interaction with television using speech, whereby each user of the system may have a set of determined preferences that are automatically selected through identification/verification of the speaker's voice. (see col. 1, lines 8-11). Junqua more specifically teaches a system wherein a "number 'T' of training speakers provide a corpus of training data upon which the eigenspace will be constructed." (see col. 8, lines 12-13). The "training data are then used to train a speaker dependent model ... One model per speaker is constructed ... with each model representing the entire inventory of sound units that is to be understood by the recognition system." (see col. 8, lines 16-20). "After all training data from T speakers have been used to train the respective speaker dependent model, a set of T supervectors is constructed." (see col. 8,

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lines 39-43). Junqua further teaches that "[f]or speaker identification, the new user data is assigned to the closest training speaker in eigenspace ... The system will thus identify the new speech as being that of the prior training speaker whose data point or data distribution lies closest to the new speaker in eigenspace." (see col. 9, line 65 – col. 10, line 3). "Once the eigenvoice space has been constructed, speaker normalization, speaker adaptation or environment adaptation can be readily accomplished... The speaker dependent mode can be trained in a supervised mode, where the training system speech recognition system uses a speaker independent mode to determine the content of the adaptation speech." (see col. 10, lines 28-42).

Junqua fails to disclose "deriving user models from determined details about the style of speech of user inputs and/or details about interactions in dialogs between users and the dialog system (1), wherein the style of speech is determined based on factors selected from the group consisting of: the number of polite phrases used, address used, speech level, information density, vocabulary and use of foreign words, number of different words and classification of words of speech inputs with respect to rare occurrence," or "the system output in content and/or form is based on the experience level of the user model in that if the experience level is low, the system output is a first length, while if the experience level is high, the system output is a second length lesser than the first length," as is recited in the claims.

Partovi discloses a method and apparatus for providing personalized information content over telephone lines. Partovi discloses that the personalized content is specific to the user based on her/his telephone identifying information and may be further customized based on the time, data, the calling party's dialect and speech pattern. Partovi further discloses that embodiments of the invention will immediately present a caller personalized content based on her/his profile using the appropriate dialect as well as the caller's preferred content. (see abstract).

Allinger discloses a voice system for presenting information to a user, wherein based on the user inputs regarding knowledge of a subject matter, the amount of information presented to the user is adjusted accordingly. Allinger more specifically discloses that "[t]o enable the guided tour to be shortened for visitors with prior

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knowledge in individual areas, the database preferably also contains one or more abbreviated versions of logically preceding information units for each information unit, which is placed before the detailed information selected by the system." (see page 7, lines 10-15). Allinger further teaches that the system is interactively adaptive to respond to user commands to provide additional information, after the initially provided information. (see page 7, lines 11-37).

Hence, Allinger teaches a system including a plurality of predetermined materials regarding a subject matter, each one of the predefined materials containing more information than a preceding one of the predetermined materials. The system then provides a select one of the predetermined materials to a user based on the user's inputs regarding the amount of information to be provided regarding a subject matter. The system provides more detailed information based on the user's desire for additional information.

Contrary to the statements made in the Office Action, the combination of Juaqua, Partovi and Allinger fails to render obvious the invention recited in the independent claims.

A claimed invention is prima facie obvious when three basic criteria are met. First, there must be some suggestion or motivation, either in the reference themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine the teachings therein. Second, there must be a reasonable expectation of success. And, third, the prior art reference or combined references must teach or suggest all the claim limitations.

Junaqua discloses creating models based on a plurality of user inputs and selecting a model based on characteristics of inputs from a speaker. Allinger discloses selecting predetermined materials based on a user's input regarding the desired level of information about a subject matter. However, contrary to the statements found in the Office Action, the output of a device constructed from the teachings of Juanqua, Partovi and Allinger is not determined based on the user model and the experience level of the user, as is recited in the claims. More specifically, the process of Allinger is based on a level of information desired by the user and an inexperienced user may select the same

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level of predetermined material as that selected by an experience user. Similarly, an experience user may select additional detailed information based on a desire to learn (or hear) more information. See, for example, page 8, lines 5-10, which state, "[t]he selection of the information in accordance with the core information offered to each visitor is carried out, e.g., by using subject parameters for the individual subject areas which, in the case of approval by the visitor to information offered for this area is increased ... or reduced." Accordingly, Allinger initially provides the same material content to a user independent of the experience level and adapts the amount of material presented based on the user's desire to learn more or less.

Junqua, Partovi and Allinger, individually and in combination, fail to teach or suggest a material element claimed in the independent claims, -- i.e., wherein the system output in content and/or form is based on the experience level of the user model in that if the experience level is low, the system output is a first length, while if the experience level is high, the system output is a second length lesser than the first length.

For the above remarks, applicant submits that the reason for the rejection has been overcome and respectfully requests withdrawal of the rejection and allowance of these claims.

With regard to the remaining claims, these claims ultimately depend from the independent claims which have been shown to contain subject matter not disclosed by, and, hence, allowable over, the reference cited. Accordingly, these claims are also allowable by virtue of their dependency from an allowable base claim. Applicant respectfully requests withdrawal of the rejection and allowance of these claims.

Claims 2, 4, and 10 stand rejected under 35 USC 103(a) as being unpatentable over Juaqua in view of Partovi and further in view of Allinger as applied to claims 1 and 8 and further in view of Larsen (IEEE Publication).

The aforementioned claims are each dependent from an independent claim discussed above and are therefore believed patentable for the same reasons. As shown above the independent claims are not obvious in view of the teachings of Juaqua, Partovi and Allinger as the combination fails to disclose a material element claimed and the

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additional reference cited fails to provide any teachings to correct the deficiencies found to exist in the combination of Juaqua, Partovi and Allinger.

Accordingly, the aforementioned remaining claims are also allowable by virtue of their dependence from an allowable base claim. Since each dependent claim is also deemed to define an additional aspect of the invention, individual consideration of the patentability of each on its own merits is respectfully requested.

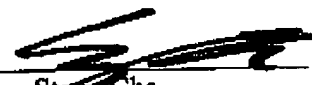
For all the foregoing reasons, it is respectfully submitted that all the present claims are patentable in view of the cited references. A Notice of Allowance is respectfully requested.

Applicant's attorney would like to thank the Examiner for prompting providing an English translation of the cited German Patent No. 197 47 745, which was cited in rejecting the claims, when requested.

Respectfully submitted,

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